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Date: 11/4/04 2:38PM
Subject: Comments on Administrative Draft

To whom it may concern:

As a member of a family that operates a dairy, I am very concerned about the proposal from the Regional Water Quality Board. After reviewing the "Administrative Draft" we are alarmed at what it contains. Some of the most outrageous proposed regulations include:

* Dry manure must be incorporated within 48 hours of application to a field, or subject to a violation of water code section 13350, which carries a minimum fine of \$100 per day of violation, not to exceed \$5,000 per day of violation.

* IN MANY CASES, 48 HOURS IS NOT ENOUGH TIME TO GET MANURE WORKED IN TO THE GROUND. WHERE IS THE SCIENCE BEHIND THE ASSUMPTION THAT THIS NEW TIMELINE WILL HELP?

* Dischargers must record the following when irrigating with wastewater: dates, locations and approximate volume of process wastewater; weight and moisture content of manure application; weather conditions at the time of and 24 hours prior to and following applications; and identification of crop, acreage, dates of planting and harvest.

* WEATHER CONDITIONS? WEIGHT AND MOISTURE CONTENT? DO PEOPLE ACTUALLY HAVE THE TIME AND RESOURCES TO FOLLOW THESE GUIDELINES?

* Standing water in open animal confinement areas (including corrals), feed storage areas, and dry manure storage areas that persists for more than 24 consecutive hours after a storm event is prohibited.

THIS IS RIDICULOUS...24 HOURS! WHAT HAPPENS WHEN WE HAVE A MAJOR STORM AND IT RAINS FOR A FEW DAYS OR EVEN WEEKS? NOT EVEN THE MOST PERFECTLY GRADED CORRALS COULD MEET THIS REQUIREMENT ALL OF THE TIME. WHAT IS CONSIDERED STANDING WATER...ONE INCH, SIX INCHES, TWO FEET?

These points highlighted above are just three examples of the impractical requirements that are to be imposed on us. Farming is the toughest industry in California, and many are being forced out of the business. Imposing ridiculous requirements such as those found in the administrative draft will just push more dairymen out of the business. WHAT DOES CALIFORNIA PLAN TO DO WHEN ALL OF THE DAIRYMEN AND FARMERS ARE PUSHED OUT OF THE STATE? WHAT WILL HAPPEN TO THE ECONOMY THEN...AND MOST IMPORTANTLY, WHAT WILL WE EAT!

Significant changes to this draft must be made before it can be accepted as law. Please take in to consideration the point of view of the dairyman. You can be sure to see many of us at the public hearing in December.

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